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Via ECF

Hon. Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District Of New York
40 Foley Square
New York, NY 10007

The Initial Pretrial Conference is adjourned to October 7, 2020 at 11:30AM. The Parties' letter and proposed case management plan must be submitted by October 2, 2020.

Date: 9/18/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Re: Josefina Benitez, et al., v. Valentino U.S.A. Inc.
(S.D.N.Y. Docket No. 19-cv-11463 (MKV)(RWL))

JOINT MOTION FOR ADJOURNMENT AND EXTENSION OF TIME

Dear Judge Vyskocil:

We represent Defendant Valentino U.S.A. Inc. (hereinafter, "Valentino" or "Defendant") in the above-referenced matter. Defendant submits this joint letter motion on consent of all parties to respectfully request that: (1) the Court adjourn the September 23, 2020, Initial Pretrial Conference set forth in the Court's Scheduling Order (ECF No. 35) until October 7th or 8th, 2020, and; (2) extending the parties' time to submit their joint letter and discovery plan from September 18, 2020, until four (4) days prior to the Initial Pretrial Conference. This is the parties' first request to adjourn and extend the aforementioned dates.

The extension is necessitated by the intervening religious holiday, as well as counsels' non-delegable conflicts, including the undersigned's medical appointment on the morning of September 23, 2020, and defense counsel's mediation on the same date. Defendant's counsel also has a mediation on September 16th, and court-ordered depositions on September 17th and 18th.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ John B. Fulfree

John B. Fulfree

cc: All Counsel of Record (Via ECF)